



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 5**  
**77 WEST JACKSON BOULEVARD**  
**CHICAGO, IL 60604-3590**

**VIA ELECTRONIC MAIL**  
**DELIVERY RECEIPT REQUESTED**

Jim Janson, Environmental Engineer  
Hartford Wood River Terminal  
[jjanson@piasa-hwrt.com](mailto:jjanson@piasa-hwrt.com)

Re: Finding of Violation  
Hartford Wood River Terminal  
Hartford, Illinois

Dear Jim Janson:

The U.S. Environmental Protection Agency is issuing the enclosed Finding of Violation (FOV) to Hartford Wood River Terminal (you) under Section 113(a) of the Clean Air Act, 42 U.S.C. § 7413(a). We find that you are violating or have violated the New Source Performance Standards at 40 C.F.R. Part 60, Subpart Ka at your Hartford, Illinois facility.

Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order and bringing a judicial civil or criminal action.

We are offering you an opportunity to confer with us about the violations alleged in the FOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply and the steps you will take to prevent future violations. In addition, in order to make the conference more productive, we encourage you to submit to us information responsive to the FOV prior to the conference date.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contact in this matter is Jason Schenandoah. You may call him at (312) 886-9506 or email him at [schenandoah.jason@epa.gov](mailto:schenandoah.jason@epa.gov) to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,

Nathan Frank  
Supervisor, Air Enforcement and Compliance Assurance Section IL/IN

Enclosure

cc: Kent Mohr, Manager  
Bureau of Air, Compliance Section  
Illinois Environmental Protection Agency  
Kent.Mohr@Illinois.gov

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measurements or inspections of the primary seal, the closure device is to consist of two seals, one above the other. The lower seal is referred to as the primary seal, and the upper seal is referred to as the secondary seal. The roof is to be floating on the liquid at all times (i.e., off the roof leg supports) except during initial fill and when the tank is completely emptied and subsequently refilled. The process of emptying and refilling when the roof is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible.

7. Floating roof provisions at 40 C.F.R. § 60.112a(a)(1)(i)(A) require that the accumulated area of gaps between the tank wall and the metallic shoe seal shall not exceed 212 cm<sup>2</sup> per meter of tank diameter (10.0 in<sup>2</sup> per ft of tank diameter) and the width of any portion of any gap shall not exceed 3.81 cm (1.5 in).

8. HWRT owns and operates a bulk petroleum terminal at 900 North Delmar Avenue, Hartford, Illinois.

9. HWRT owns and operates thirteen petroleum product storage tanks at the address in paragraph 8, including a tank referred to as Tank 80-9.

10. Tank 80-9 was constructed, reconstructed, or modified after May 19, 1978, and prior to July 23, 1984.

11. Tank 80-9 has a storage capacity greater than 151,416 liters (40,000 gallons), but not exceeding 1,589,873 liters (420,000 gallons).

12. The petroleum liquid stored in Tank 80-9 has a true vapor pressure equal to or greater than 10.3 kPa (1.5 psia) but not greater than 76.6 kPa (11.1 psia).

13. Tank 80-9 is subject to the requirements at 40 C.F.R. § 60.112a(a)(1)(i)(A).

14. Pursuant to Section 114 of the CAA, EPA sent a request for information to HWRT on August 10, 2020 (114 Request).

15. The 114 Request required HWRT to perform Topside Inspections of the seals on tanks, including Tank 80-9.

16. The Topside Inspections required HWRT to have a third-party inspect the integrity of the primary and secondary seals of Tank 80-9, as well as measure the gaps between the tank wall and the primary and secondary seals.

17. Results of the Topside Inspections demonstrate that the primary seal on Tank 80-9 had a maximum gap width of 1.75 inches and a total gap area of 2097.5 square inches.

18. Tank 80-9 has a tank diameter of 120 feet.

## **Violations**

19. As demonstrated in Paragraph 17, the primary seal on Tank 80-9 has a maximum gap width greater than 1.5 inches between the seal and the tank wall in violation of 40 C.F.R. § 60.112a(a)(1)(i)(A).

20. As demonstrated by Paragraphs 17 and 18, the primary seal on Tank 80-9 has a total gap area of greater than 1200 square inches between the seal and the tank wall in violation of 40 C.F.R. § 60.112a(a)(1)(i)(A).

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Michael D. Harris  
Division Director  
Enforcement and Compliance Assurance Division